

**REMARKS/ARGUMENTS**

Reconsideration of this application in light of the above amendments and following comments is courteously solicited.

Initially the undersigned would like to thank Examiner Tang for the courtesies extended during a personal interview held with the undersigned at the U.S. Patent and Trademark Office on November 17, 2004. During the above noted oral hearing the Martin reference was discussed in detail with regard to the then pending independent claim 1. Agreement was reached with Examiner Tang as to allowable subject matter with respect to the Martin reference. In this regard the Examiner's Interview Record is incorporated herein by reference. Independent claims 1 and 13 have now been further amended in light of the agreement reached at the above noted oral hearing. Method claim 1 positively sets forth a method for modeling and implementing a web application wherein the web application is a workflow application. In addition, independent claim 1 has been amended so as to set forth with specificity that a run-time implementation of the workflow application is obtained directly and without transformation, interpretation, or code generation. Support for the amendments with respect to "web application" can be found, for example, in paragraphs [0002], [0004], [0005], [0006], [0008], [0009] and elsewhere of published application US/2002/0066073 published May 30, 2002. Support for the limitation regarding a "workflow" system is found, for example, [0012], [0030], [0041], [0088], [0089], of the published application. Finally, support for the limitation regarding the implementation of the workflow application without transformation, interpretation or code generation may be found, for example, in paragraphs [0008], [0012], [0019], [0029] of the said published U.S. application.

Independent apparatus claim 13 has been amended in a similar fashion by providing the means for implementing a process model directly and without compilation, interpretation or code generation as run-time implementation of a web-based workflow application. Accordingly, the comments made hereinbelow with respect to the Martin reference is applicable to both independent claim 1 and independent claim 13 as currently amended.

It is respectfully submitted that independent claims 1 and 13 as amended patentably distinguish over the cited Martin document. Initially it should be noted that the Martin document is often very general in its descriptions. because of the generality of the Martin reference it is apparent that one may, in hindsight, read various things into the document which in fact are not taught, disclosed, or contemplated thereby. The Martin document addresses many tools for computer-aided systems engineering; however, he does not discuss workflow applications. Quite possibly the reason for this is that the document itself was published in 1993 and, therefore, web flow applications were not considered. In addition, the Martin document does not disclose (closed loop approach) of the present invention, namely, that from a graphical process designed on a computer, the inventive method creates, integrated without any translation or interpretation the run-time process application that actually executes the designed process. Furthermore, the run-time application it is displayed in the same way that the graphical design was done so that the user immediately sees what has been created. Thus, in accordance with the present invention, process design and process execution are closely linked in a manner which heretofore has not been accomplished and is clearly not disclosed, anticipated or rendered obvious by the Martin

document. In light of the foregoing, and in light of the discussions with the examiner at the above noted oral hearing, it is submitted that the claims as currently amended patentably define over the art of record and an early indication of same is respectfully requested.

An earnest and thorough attempt has been made by the undersigned to resolve the outstanding issues in this case and place same in condition for allowance. If the Examiner has any questions or feels that a telephone or personal interview would be helpful in resolving any outstanding issues which remain in this application after consideration of this amendment, the Examiner is courteously invited to telephone the undersigned and the same would be gratefully appreciated.

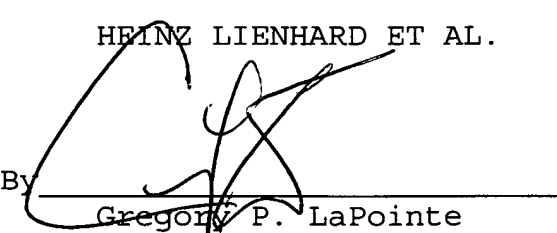
It is submitted that the claims as amended herein patentably define over the art relied on by the Examiner and early allowance of same is courteously solicited.

If any fees are required in connection with this case, it is respectfully requested that they be charged to Deposit Account No. 02-0184.

Respectfully submitted,

HEINZ LIENHARD ET AL.

By

  
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I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to:  
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Rachel Piscitelli